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September 12, 2018

VIA ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court Southern
District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
Betru, et al. v. Islamic Republic of Iran, 18-cv-8297

Dear Judge Daniels and Magistrate Judge Netburn:

As required by the Court's July 10, 2018 Amended Order Approving Notices to Conform, Short Form Complaints and Notices of Amendment (ECF Doc. 4045), we submit this letter on behalf of the 39 plaintiffs in *Betru et al. v. Islamic Republic of Iran*, civil docket no 18-cv-8297, who have filed a Short Form Complaint against the Islamic Republic of Iran ("Iran") and write to request that the action be made part of this multi-district litigation (03 MDL 1570). We have also filed a Related Case Statement on the civil docket, explaining why the newly filed case is related to 03 MDL 1570.

We will shortly be filing a motion for final default judgment against Iran for certain *Betru* plaintiffs in order to submit their applications to the United States Victims of State Sponsored Terrorism, which we hope to do on or before September 14, 2018, which is the last day for new claimants to file applications for consideration in the second round of payments.

Respectfully,

KREINDLER & KREINDLER LLP

/s/ James P. Kreindler

cc: All Counsel via ECF

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